

DOCKET FILE COPY ORIGINAL

BEFORE THE FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C.

RECEIVED

MAR 09 2000

In Re)
)
Amendment of Section 73.202(b))
Table of Allotments,)
FM Broadcast Stations)
Houston and Palmer, Alaska)

MM Docket

RM-

FCC 17-11-0011

To: Chief, Policy and Rules Division

PETITION FOR RULEMAKING

Chester P. Coleman ("Coleman"), licensee of Station KADX(FM), Houston, Alaska, hereby petitions for amendment of Section 73.202(b) of the Commission's Rules as follows:

1. Substitute Channel 238C1 for Channel 234C2 at Houston, Alaska, and modify the license for Station KADX to specify operation on Channel 238C1;
2. Substitute Channel 234C1 for vacant Channel 238C1 at Palmer, Alaska.

Attached hereto is an Engineering Statement prepared by the consulting engineering firm of Hatfield & Dawson which establishes that Channel 238C1 can be allotted for Houston, Alaska, using the existing transmitter site for Station KADX as the allotment reference point in compliance with the Commission's FM station separation and city coverage rules, assuming that Channel 234C1 is substituted for Channel 238C1 at Palmer.

The attached Engineering Statement also establishes that Channel 234C1 can be assigned for use at Palmer using the present reference point for the existing Channel 238C1 allotment, assuming

No. of Copies rec'd 014
List ABCDE
MNB

that Channel 238C1 is substituted for Channel 234C1 at Houston.

Finally, the attached Engineering Statement establishes that there no area will lose service as a result of the channel substitution at Houston, but an area of 7859 sq. km with a population of 2,123 people will gain service.

If this Petition is granted, Coleman will promptly file an application to implement the channel change and upgrade for Station KADX and, upon grant of such application, will promptly upgrade Station KADX's facilities on Channel 238C1.

Respectfully submitted,


David Tillotson

4606 Charleston Terrace, N.W.

Washington, DC 20007

Tel: 202/625-6241

Attorney for Chester P. Coleman

Date: March 3, 2000

JAMES B. HATFIELD, PE
BENJAMIN F. DAWSON III, PE
THOMAS M. ECKELS, PE
STEPHEN S. LOCKWOOD, PE

PAUL W. LEONARD, PE
ERIK C. SWANSON
THOMAS S. GORTON
DAVID J. PINION, PE
CONSULTANT

HATFIELD & DAWSON
CONSULTING ELECTRICAL ENGINEERS
9500 GREENWOOD AVE. N.
SEATTLE, WASHINGTON 98103

TELEPHONE
(206) 783-9151
FACSIMILE
(206) 789-9834
E-MAIL
hatdaw@hatdaw.com
MAURY L. HATFIELD, PE
CONSULTANT
Box 1326
ALICE SPRINGS, NT 5950
AUSTRALIA

ENGINEERING STATEMENT

PETITION FOR RULEMAKING TO
AMEND SECTION 73.202 OF THE RULES
AND REGULATIONS FOR THE FEDERAL
COMMUNICATIONS COMMISSION

TO ASSIGN FM CHANNEL 238C1
FOR USE AT HOUSTON, ALASKA

AND TO ASSIGN FM CHANNEL 234C1
FOR USE AT PALMER, ALASKA

CHESTER P. COLEMAN

3/2000

ENGINEERING STATEMENT

This Engineering Statement has been prepared on behalf of Chester P. Coleman ("Coleman"), in support of a Petition for Rulemaking to amend §73.202 of the Commission's Rules. Coleman proposes:

- 1) The substitution of Channel 238C1 for Channel 234C2 at Houston, Alaska, and modification of the license of FM station KADX to specify operation on Channel 238C1, and;
- 2) The substitution of Channel 234C1 for vacant Channel 238C1 at Palmer, Alaska.

Houston Channel 238C1 Allocation Study

As outlined in the attached channel study, Channel 238C1 can be assigned for use at Houston at the present transmitter site of KADX (NL 61° 29' 23" x WL 149° 45' 52") in compliance with the Commission's applicable Rules and Regulations regarding the separation among FM allotments, assuming that Channel 234C1 is substituted for Channel 238C1 at Palmer. It should be noted that construction permit BPH-930204MA for Channel 238C1 at Palmer has been canceled.

Hatfield & Dawson Consulting Engineers

Palmer Channel 234C1 Allocation Study

As outlined in the attached channel study, Channel 234C1 can be assigned for use at the present allotment site (NL 61° 36' 00" x WL 149° 6' 30") for vacant Channel 238C1 at Palmer, assuming that Channel 238C1 is substituted for Channel 234C1 at Houston.

Gain and Loss Areas

There are no gain or loss areas associated with the proposed channel substitution at Palmer, since the new (and equivalent) Class C1 channel would be allotted at the coordinates of the existing and vacant Palmer Class C1 allotment.

Since it is proposed to allot Channel 238C1 at the present KADX site, there would be no loss area associated with the proposed channel substitution at Houston. There would, however, be a gain area. The present Channel 234C2 allotment provides 60 dBu service to 8558 km², encompassing 262,117 persons (1990 Census), whereas the proposed Channel 238C1 allotment would provide 60 dBu service to 16,417 km², encompassing 264,240 persons (1990 Census). This represents an increase of 7859 km² and 2,123 persons.

No Canadian Concurrence Required

Since neither Houston nor Palmer is located within 320 kilometers of the US-Canadian border, concurrence of the Canadian government will not be required.

Hatfield & Dawson, Inc.

Page: 1
02/28/12

Seattle, WA

FM SEPARATION STUDY

Job Title :Houston 238C1

Separation Buffer 32 km

FCC DB Date : 12/30/99

Channel 238C1 (95.5 MHz)

Coordinates : 61-29-03 149-45-52

Call Status	City State	FCC File No.	Channel Freq.	ERP(kW) HAAT(m)	Latitude Longitude	Bearing deg-Tru	Dist. (km)	Req. (km)
----------------	---------------	--------------	------------------	--------------------	-----------------------	--------------------	---------------	--------------

K237CI	Kenai		237D	0.46 DA	60-30-40	217.5	135.64	0
LIC	AK	BLFT870121TC	95.3	.0	151-16-12		.00	TRANS
VIA SATELLITE								

VAC	Palmer		238C1		61-36-00	69.4	37.21	245
	AK		95.5		149-06-30		-207.79	SHORT

KEEN	Palmer		238C1	51.	61-37-22	68.4	42.58	245
CP	AK	BPH930204MA	95.5	-34.0	149-01-06		-202.42	SHORT
KEEN CP cancelled & call sign deleted 950912 -- 950830 307 application								
treated as petition for reconsideration -- petition for recon. denied 960306								
-- application for review filed 960327 -- application for review denied								
970310 -- appealed to Court of Appeals								

** End of separation study for channel 238C1 **

Hatfield & Dawson, Inc.

Page: 1
02/28/00

Seattle, WA

FM SEPARATION STUDY

Job Title :Palmer 234C1

Separation Buffer 32 km

FCC DB Date : 12/30/99

Channel 234C1 (94.7 MHz)

Coordinates : 61-36-00 149-06-30

Call Status	City State	FCC File No.	Channel Freq.	ERP(kW) HAAT(m)	Latitude Longitude	Bearing deg-Tru	Dist. (km)	Req. (km)
----------------	---------------	--------------	------------------	--------------------	-----------------------	--------------------	---------------	--------------

KADX	Houston		234C2	50.	61-29-03	250.0	37.22	224
LIC	AK	BLH990525KD	94.7	113.0	149-45-52		-186.78	SHORT
One-Step Application From Channel 232A								

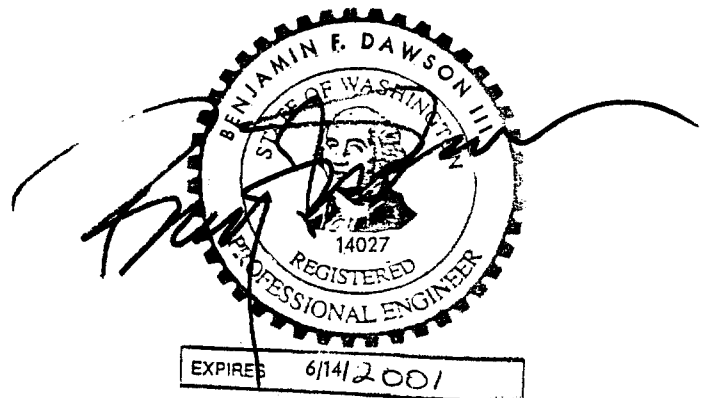
KNIKFM	Anchorage		287C1	51.	61-11-33	223.3	62.08	34
LIC	AK	BLH900507KF	105.3	78.0	149-54-01		28.08	CLEAR

** End of separation study for channel 234C1 **

Certification

This Engineering Statement supporting a Petition for Rulemaking to revise the Table of Allotments at Houston and Palmer, Alaska has been prepared on behalf of Chester P. Coleman. All representations herein are true to the best of my knowledge. I am an experienced radio engineer whose qualifications are a matter of record with the Federal Communications Commission. I am a partner in the firm of Hatfield & Dawson Consulting Engineers and am Registered as a Professional Engineer in the States of Washington and California.

Signed this 1st of March, 2000.



Benjamin F. Dawson III, P.E.

Hatfield & Dawson Consulting Engineers